

FILED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

DEC 27 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]*
DEPUTY CLERK

United States of America

)

v.

)

Jose Antonio LOPEZ Lopez

)

Case No.

)

DR:23-M-03482

)

)

)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/22/2023 in the county of Val Verde in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S. Code § 554

Fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.

This criminal complaint is based on these facts:

See Attachment A.

 Continued on the attached sheet.*Eric*

Complainant's signature

Eric B. Walker, HSI Special Agent

Printed name and title

Matthew Watters

Judge's signature

Matthew Watters, United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/27/23City and state: Del Rio, Texas

Attachment "A"

On December 22, 2023, Jose Antonio LOPEZ Lopez (LOPEZ), a United States Citizen, arrived at the Del Rio, Texas Port of Entry (POE), Outbound and destined for Mexico, as the driver and sole occupant of a 2005 Chevy Silverado (TX License Plates RSD9827). LOPEZ stated he had nothing to declare and was selected for a Secondary Inspection. During secondary inspection, Customs and Border Protection Officers (CBPOs) located one [1] loaded .45 ACP Handgun, three [3] loaded .45 ACP magazines, 34 rounds of .45 ACP ammunition, 200 rounds of 9mm ammunition and forty [40] 30 round AR rifle magazines concealed within the vehicle. A Homeland Security Investigations (HSI) Del Rio special agent (SA) was present during the encounter and provided investigative assistance.

At the Del Rio POE, LOPEZ was read his Miranda rights by HSI SAs in the English language. LOPEZ waived his Miranda rights both verbally and in written form and chose to speak to the Investigators. During the post-Miranda interview, LOPEZ freely admitted to knowingly purchase, conceal, transport and attempt to illegally export firearms from the United States (US) to Mexico (MX) in collaboration with a third party. LOPEZ stated the third party intended to compensate him financially for his efforts.

LOPEZ stated that he had made multiple previous trips, when he had successfully transported other firearms-related material through the Del Rio POE, in collaboration with the same third party and was provided financial compensation for those trips.

The facts of the case were presented to Assistant United States Attorney (AUSA) Katherine Gorski, who accepted federal prosecution of LOPEZ for a violation of 18 U.S. Code § 554, Fraudulently or knowingly exports or sends from the United States, or attempts to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States.